

FOLEY & LARDNER LLP

ATTORNEYS AT LAW
ONE MARITIME PLAZA
SUITE 600
SAN FRANCISCO, CA 94111-3404
TELEPHONE: 415-434-4484
FACSIMILE: 415-434-4507

THOMAS F. CARLUCCI (NV BAR #3208)
KEVIN WOODALL (CA BAR NO. 180650)
LATASHA GARRISON-FULLWOOD (FL BAR NO. 0180602)

HALE LANE PEEK DENNISON AND HOWARD
5441 KIETZKE LANE, SECOND FLOOR
RENO, NEVADA 89511
TELEPHONE: 775 327-3000
FACSIMILE: 775-786-6179

ANTHONY L. HALL (NV BAR 5977)

ATTORNEYS FOR DEFENDANT, VISTEON
CLIMATE CONTROL SYSTEMS, LTD

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEVADA**

ROBERT NEWBERG,
PLAINTIFF,

v.

VISTEON CLIMATE CONTROL
SYSTEMS, LTD. and DOES I-V; BLACK &
WHITE CORPORATIONS I-V; ABLE &
BAKER PARTNERSHIPS, inclusive,
DEFENDANTS.

) **DEFENDANT'S MOTION FOR**
) **EXTENSION OF TIME TO FILE**
) **STIPULATION OF DISMISSAL**

) CASE No. CV-N-05-0451- LRH-VPC

On June 20, 2006, the parties engaged in a settlement conference before Magistrate Judge Valerie Cooke. The parties, after receiving the transcript of the Settlement Conference, were able to reach a mutually agreeable settlement agreement.

This Court granted the parties an extension on the deadline to file the Joint Stipulation of Dismissal until August 4, 2004. However, under the settlement agreement, Plaintiff has a seven day right of rescission that will not expire until August 11, 2006. Plaintiff is not inclined to file the Stipulation of Dismissal prior to the expiration of this period. As a result, the parties will file a stipulation of dismissal upon the expiration of the Plaintiff's right of

DEFENDANT VISTEON CLIMATE CONTROLS SYSTEM'S MOTION FOR EXTENSION OF TIME TO FILE
STIPULATION OF DISMISSAL WITH PREJUDICE
CASE NO. 05-0451-HDM-VPC

1 rescission.

2 WHEREFORE, Defendant respectfully moves for an Order extending the
3 deadline for the parties to file a Stipulation of Dismissal to August 20, 2006.

4 August 4, 2006

RESPECTFULLY SUBMITTED

5
6
7 BY: /s/ LATASHA A. GARRISON-FULLWOOD
8 THOMAS F. CARLUCCI (NV BAR NO.
9 3208)
10 KEVIN WOODALL (CA BAR NO. 180650)
11 FOLEY & LARDNER, LLP
12 ONE MARITIME PLAZA, SUITE 600
13 SAN FRANCISCO, CA 94111-3404
14 TELEPHONES; 415.434.4484
15 FACSIMILE: 415.434.4507

16
17 LATASHA GARRISON-FULLWOOD
18 (FL BAR NO: 0180602)
19 FOLEY & LARDNER, LLP
20 ONE INDEPENDENT DRIVE, SUITE 1300
21 JACKSONVILLE, FL 32202
22 TELEPHONE: 904.359.2000
23 FACSIMILE: 904.359.8700

24 IT IS SO ORDERED.

25 DATED: August 8, 2006.

26
27 

28

LARRY R. HICKS
UNITED STATES DISTRICT JUDGE

HALE LANE PEEK DENNISON AND
HOWARD
ANTHONY L. HALL, (NV. BAR NO 5977)
5441 KIETZKE LANE, SECOND FLOOR,
RENO, NEVADA 89511
TELEPHONE: 775.327.3000
FACSIMILE: 775.786.6179
ATTORNEYS FOR DEFENDANT
VISTEON CLIMATE CONTROLS
SYSTEMS, LTD.